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June 8, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

We write on behalf of the nonparty witness who filed a letter-motion to quash on June 1, 2021 ("Motion"). *See* ECF No. 6841 (sealed). This evening, we will file a reply in support of the Motion. That reply reveals the nonparty's name, and we therefore respectfully request that the Court accept the reply under seal under the general MDL protective order, ECF No. 1900. *See* ECF No. 4696 at 13 (approving sealing under the MDL protective order to "[p]rotect[] the privacy of innocent third parties").

We are making today's filing under seal using the Court's sealed ECF procedures. Copies of this filing (clean and with highlighted proposed redactions) are being sent today by email to Your Honor's chambers, and to counsel for Plaintiffs, the United States, and Dallah Avco. No courtesy copies of either this letter or today's sealed filings are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for Undisclosed Nonparty*

cc: All MDL Counsel of Record (via ECF)